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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

REQUEST TO ADD
PRIVATE ADDRESS FORWARDING
TO THE MARKET DOMINANT PRODUCT LIST

Docket No. MC2013-60

MOTION OF THE UNITED STATES POSTAL SERVICE FOR LEAVE TO FILE A LATE REPLY TO PETITIONER'S DECEMBER 20th MOTION (December 27, 2013)

The United States Postal Service hereby requests permission to file on Friday,

January 3, 2014, its Reply to Petitioner's Motion For Declarations, Further Proceedings,

Disclosure, And Appearance; Or In The Alternative, For Suspension Pending FOIA

Appeals.¹

Under the Commission's rules, replies to motions are ordinarily due to be filed in seven days. Accordingly, the Postal Service's reply to Petitioner's December 20th motion is due today. Undersigned counsel was heavily involved this week in the preparation of materials submitted in support of the Docket No. N2014-1 request filed today. Dedication to the preparation of that filing has constrained counsel's ability to confer with internal stakeholders and formulate the Postal Service's Docket No. MC2013-60 reply. Various postal managers who need to be consulted for purposes of preparing that reply have been out of the office in connection with the Christmas holiday either all or most of this week, and have been unavailable for consultation. It is expected that they will be back in the office or otherwise available for consultation next week. Accordingly, the Postal Service anticipates being able to file a reply to

¹ As supplemented by his December 23rd Addendum To Closing Motion.

Petitioner's December 20th and 23rd pleadings next Friday, January 3rd. The Postal Service considers it fair to assume that no party will be materially prejudiced by the resulting delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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